

Fees for Plaintiff's Motion for Summary Judgment

Date	Narrative	Attorney	Hours	Amount
02/22/2021	Disc MBG re status & strategy of SJ motion & related papers	Chappell, Milton L	0.40	\$160.00
03/01/2021	Disc MBG re status & strategy of summary judgment	Chappell, Milton L	0.80	\$320.00
03/02/2021	Disc MBG re status & strategy of summary judgment arguments & status of law re same	Chappell, Milton L	0.60	\$240.00
03/11/2021	Disc MBG re status & strategy of SJ motion, affidavits & potential witnesses	Chappell, Milton L	0.40	\$160.00
03/15/2021	Disc MBG re status & strategy of SJ arguments	Chappell, Milton L	0.40	\$160.00
04/09/2021	Disc MBG re status & strategy of summary judgment arguments	Chappell, Milton L	0.30	\$120.00
04/14/2021	Disc MBG re status & strategy of summary judgment argument re relief for RLA claim and status & strategy of Title VII claim in general	Chappell, Milton L	0.00	\$0.00
04/19/2021	Disc MBG re summary judgment status, strategy, arguments & review/edit schedule; protective order & filing under seal matters	Chappell, Milton L	0.60	\$240.00
04/27/2021	Research, disc & email re protective order & status & strategy of SJ motion & related memorandum	Chappell, Milton L	0.50	\$200.00
04/29/2021	Emails & disc MBG re status & strategy of SJ memorandum, scheduling edits & rev, arguments & protective order	Chappell, Milton L	0.60	\$240.00
04/30/2021	Research & edit SJ memorandum re union; disc MBG re same, emails re same	Chappell, Milton L	6.70	\$2,680.00
02/15/2022	Rev extension filing, disc MBG re status & strategy of response & redaction & filing of SJ documents	Chappell, Milton L	0.70	\$280.00
02/16/2022	Disc MBG re redaction issues & filing SJ documents	Chappell, Milton L	0.20	\$80.00
02/18/2022	Disc MBG re status & strategy of filing of redacted exhibits and SJ briefs & replies & SWA atty responses	Chappell, Milton L	0.30	\$120.00
				\$5,000.00

Date	Narrative	Attorney	Hours	Amount
01/28/2021	Researching case law supporting summary judgment arguments and reviewing legal arguments	Gilliam, Matt B	3.00	\$1,050.00
02/12/2021	Outlining L556 and SWA MSJ legal arguments and evidence	Gilliam, Matt	3.50	\$1,225.00
02/16/2021	Outlining L556 and SWA MSJ legal arguments and evidence	Gilliam, Matt	6.70	\$2,345.00
02/17/2021	Outlining and drafting SWA MSJ legal arguments and evidence	Gilliam, Matt	6.60	\$2,310.00
02/18/2021	Outlining and drafting SWA MSJ legal arguments and evidence	Gilliam, Matt	5.60	\$1,960.00
02/19/2021	Researching undue hardship argument for SWA MSJ; reviewing and editing JDJ motion to withdraw	Gilliam, Matt B	1.10	\$385.00
02/22/2021	Outlining and drafting SWA MSJ legal arguments and evidence	Gilliam, Matt	3.40	\$1,190.00
02/23/2021	Outlining and drafting SWA MSJ legal arguments and evidence; reviewing and editing JDJ motion to withdraw	Gilliam, Matt B	6.80	\$2,380.00
02/24/2021	Outlining and drafting L556 MSJ legal arguments and evidence	Gilliam, Matt	4.30	\$1,505.00
02/25/2021	Outlining and drafting SWA MSJ legal arguments and evidence	Gilliam, Matt	6.10	\$2,135.00
02/26/2021	Researching SWA MSJ legal arguments and evidence	Gilliam, Matt	5.70	\$1,995.00
03/01/2021	Researching L556 MSJ legal arguments and evidence	Gilliam, Matt	8.30	\$2,905.00
03/02/2021	Evidence review for MSJs	Gilliam, Matt	2.90	\$1,015.00
03/04/2021	Evidence review for MSJs	Gilliam, Matt	7.10	\$2,485.00

03/05/2021	Evidence review for MSJs	Gilliam, Matt	4.50	\$1,575.00
03/08/2021	Evidence review for MSJs	Gilliam, Matt	8.30	\$2,905.00
03/09/2021	Outlining and drafting L556 MSJ legal arguments and evidence	Gilliam, Matt	9.00	\$3,150.00
03/10/2021	Analyzing disparate treatment evidence for response and MSJ legal arguments	Gilliam, Matt B	5.90	\$2,065.00
03/11/2021	Outlining and drafting MSJ legal arguments and evidence	Gilliam, Matt	9.10	\$3,185.00
03/12/2021	Outlining and drafting MSJ legal arguments and evidence	Gilliam, Matt	6.70	\$2,345.00
03/15/2021	Researching and drafting MSJ legal arguments and evidence for SWA and L556	Gilliam, Matt B	8.10	\$2,835.00
03/16/2021	Researching and drafting MSJ legal arguments and evidence for SWA and L556	Gilliam, Matt B	5.70	\$1,995.00
03/18/2021	MSJ strategy discussion with co counsel; researching and drafting MSJs for SWA and L556	Gilliam, Matt B	3.00	\$1,050.00
03/19/2021	Researching and drafting MSJ legal arguments and evidence for SWA and L556	Gilliam, Matt B	7.40	\$2,590.00
03/22/2021	Researching and drafting MSJ legal arguments and evidence for SWA and L556	Gilliam, Matt B	5.10	\$1,785.00
03/23/2021	Researching and drafting MSJ legal arguments and evidence for SWA and L556	Gilliam, Matt B	6.50	\$2,275.00
03/24/2021	Researching and drafting MSJ legal arguments and evidence for SWA and L556	Gilliam, Matt B	3.70	\$1,295.00
03/29/2021	Researching and drafting L556 MSJ and organizing evidence	Gilliam, Matt	8.30	\$2,905.00
03/30/2021	Researching and drafting L556 MSJ Brief and preparing statements of material fact	Gilliam, Matt B	10.20	\$3,570.00
03/31/2021	Researching and drafting L556 MSJ Brief and preparing statements of material fact	Gilliam, Matt B	8.70	\$3,045.00
04/01/2021	Researching and drafting L556 MSJ Brief and preparing statements of material fact	Gilliam, Matt B	4.30	\$1,505.00
04/02/2021	Drafting SWA and L556 MSJ Briefs and preparing statements of material fact; communications with client	Gilliam, Matt B	6.20	\$2,170.00
04/05/2021	Drafting SWA and L556 MSJ Briefs and preparing statements of material fact	Gilliam, Matt B	5.60	\$1,960.00
04/06/2021	Drafting SWA and L556 MSJ Briefs and preparing statements of material fact	Gilliam, Matt B	6.40	\$2,240.00
04/07/2021	Drafting SWA and L556 MSJ Briefs and preparing statements of material fact	Gilliam, Matt B	7.30	\$2,555.00
04/08/2021	Drafting SWA and L556 MSJ Briefs and preparing statements of material fact	Gilliam, Matt B	8.30	\$2,905.00
04/09/2021	Drafting SWA and L556 MSJ Briefs and preparing statements of material fact	Gilliam, Matt B	9.80	\$3,430.00
04/11/2021	Drafting SWA and L556 MSJ Briefs and preparing statements of material fact	Gilliam, Matt B	2.50	\$875.00
04/12/2021	Drafting SWA and L556 MSJ Briefs and preparing statements of material fact	Gilliam, Matt B	9.00	\$3,150.00
04/13/2021	Drafting SWA and L556 MSJ Briefs and preparing statements of material fact	Gilliam, Matt B	6.90	\$2,415.00
04/14/2021	Drafting SWA and L556 MSJ Briefs and preparing statements of material fact	Gilliam, Matt B	10.50	\$3,675.00
04/15/2021	Drafting SWA and L556 MSJ Briefs and preparing statements of material fact	Gilliam, Matt B	7.30	\$2,555.00
04/16/2021	Drafting SWA and L556 MSJ Briefs and preparing statements of material fact	Gilliam, Matt B	11.80	\$4,130.00

04/17/2021	Drafting SWA and L556 MSJ Briefs and preparing statements of material fact	Gilliam, Matt B	3.40	\$1,190.00
04/18/2021	Drafting SWA and L556 MSJ Briefs and preparing statements of material fact	Gilliam, Matt B	3.40	\$1,190.00
04/19/2021	Drafting SWA and L556 MSJ Briefs and preparing statements of material fact	Gilliam, Matt B	11.00	\$3,850.00
04/20/2021	Drafting SWA and L556 MSJ Briefs and preparing statements of material fact	Gilliam, Matt B	9.70	\$3,395.00
04/21/2021	Drafting SWA and L556 MSJ Briefs and preparing statements of material fact	Gilliam, Matt B	10.10	\$3,535.00
04/22/2021	Drafting SWA and L556 MSJ Briefs and preparing statements of material fact	Gilliam, Matt B	10.80	\$3,780.00
04/23/2021	Drafting SWA and L556 MSJ Briefs and preparing statements of material fact	Gilliam, Matt B	10.20	\$3,570.00
04/24/2021	Drafting SWA and L556 MSJ Briefs and preparing statements of material fact	Gilliam, Matt B	9.10	\$3,185.00
04/25/2021	Drafting SWA and L556 MSJ Briefs and preparing statements of material fact	Gilliam, Matt B	5.50	\$1,925.00
04/26/2021	Drafting SWA and L556 MSJ Briefs and preparing statements of material fact	Gilliam, Matt B	12.00	\$4,200.00
04/27/2021	Drafting SWA and L556 MSJ Briefs and preparing statements of material fact	Gilliam, Matt B	11.40	\$3,990.00
04/28/2021	Drafting SWA and L556 MSJ Briefs and preparing statements of material fact	Gilliam, Matt B	13.60	\$4,760.00
04/29/2021	Drafting SWA and L556 MSJ Briefs and preparing statements of material fact	Gilliam, Matt B	13.80	\$4,830.00
04/30/2021	Drafting SWA and L556 MSJ Briefs and preparing statements of material fact	Gilliam, Matt B	14.10	\$4,935.00
05/01/2021	Preparing MSJ appendix, motions to file under seal, MSJ, and editing brief	Gilliam, Matt B	9.80	\$3,430.00
05/02/2021	Preparing MSJ appendix, motions to file under seal, MSJ, Carter affidavit and editing brief	Gilliam, Matt B	16.50	\$5,775.00
05/03/2021	Preparing MSJ appendix, motions to file under seal, MSJ, Carter affidavit and editing brief	Gilliam, Matt B	13.70	\$4,795.00
05/04/2021	Preparing MSJ appendix, motions to file under seal, MSJ, Carter affidavit and editing brief	Gilliam, Matt B	18.10	\$6,335.00
05/05/2021	Editing MSJ brief; reviewing Court order and opinion extending discovery deadline	Gilliam, Matt B	8.10	\$2,835.00
05/06/2021	Conducting additional research for MSJ briefs	Gilliam, Matt B	1.70	\$595.00
06/16/2021	Further editing of MSJ against SWA; conducting additional research of legal issues	Gilliam, Matt B	7.70	\$2,695.00
06/17/2021	Further editing of MSJ against SWA; conducting additional research of legal issues	Gilliam, Matt B	3.80	\$1,330.00
06/18/2021	Further editing of MSJ against SWA; conducting additional research of legal issues	Gilliam, Matt B	4.00	\$1,400.00
06/21/2021	Researching speech cases for MSJs against SWA and L556	Gilliam, Matt B	0.50	\$175.00
06/23/2021	Further editing of MSJ against SWA; conducting additional research of legal issues	Gilliam, Matt B	5.80	\$2,030.00
07/07/2021	Evaluating and planning outcome of discovery dispute meetings; preparing MSJ against SWA	Gilliam, Matt B	5.40	\$1,890.00
07/08/2021	Revising and updating L556 MSJ	Gilliam, Matt B	4.10	\$1,435.00
07/09/2021	Revising and updating L556 MSJ	Gilliam, Matt B	5.70	\$1,995.00

07/12/2021	Revising and updating L556 MSJ; preparing MTC against SWA	Gilliam, Matt	7.10	\$2,485.00
08/18/2021	Preparing and updating L556 MSJ	Gilliam, Matt	9.40	\$3,290.00
08/19/2021	Preparing and updating L556 and SWA MSJs	Gilliam, Matt	7.10	\$2,485.00
08/20/2021	Preparing and updating L556 and SWA MSJs	Gilliam, Matt	6.00	\$2,100.00
08/28/2021	Preparing SWA and Local 556 MSJ Brief and Appendix	Gilliam, Matt	9.00	\$3,150.00
08/29/2021	Preparing SWA and Local 556 MSJ Brief and Appendix	Gilliam, Matt	5.00	\$1,750.00
08/31/2021	Preparing L556 and SWA MSJ	Gilliam, Matt	13.30	\$4,655.00
09/01/2021	Preparing MSJ, appendix, brief, motion to file under seal, proposed orders and exhibits for filing	Gilliam, Matt B	13.10	\$4,585.00
09/02/2021	Preparing, finalizing, and filing MSJ, appendix, brief, motion to file under seal, proposed orders and exhibits for filing	Gilliam, Matt B	16.10	\$5,635.00
10/05/2021	Reading SWA and L556 Responses; outlining SWA MSJ reply	Gilliam, Matt	5.60	\$1,960.00
10/06/2021	Reading SWA and L556 Responses; outlining SWA MSJ reply	Gilliam, Matt	1.10	\$385.00
10/07/2021	Preparing SWA MSJ reply	Gilliam, Matt	7.90	\$2,765.00
10/10/2021	Preparing SWA MSJ reply	Gilliam, Matt	8.30	\$2,905.00
10/12/2021	Preparing SWA MSJ reply	Gilliam, Matt	11.40	\$3,990.00
10/13/2021	Preparing SWA MSJ reply	Gilliam, Matt	9.80	\$3,430.00
10/14/2021	Preparing L556 MSJ reply	Gilliam, Matt	11.60	\$4,060.00
10/15/2021	Preparing SWA MSJ reply	Gilliam, Matt	12.10	\$4,235.00
10/16/2021	Preparing SWA MSJ reply	Gilliam, Matt	13.70	\$4,795.00
10/17/2021	Preparing SWA and L556 MSJ Replies	Gilliam, Matt	12.40	\$4,340.00
10/18/2021	Preparing, finalizing, and filing SWA and L556 MSJ Replies	Gilliam, Matt	15.30	\$5,355.00
02/04/2022	Reviewing SWA redacted appendix exhibits to be filed with MSJ materials	Gilliam, Matt B	1.60	\$560.00
02/07/2022	Reviewing SWA redacted appendix exhibits to be filed with MSJ materials; prepare outline of issues re redactions and communicating issues to SWA	Gilliam, Matt B	2.00	\$700.00
02/11/2022	Phone call conversation with SWA counsel re SWA motion to extend trial date; redacting exhibits for MSJ materials that should have been redacted by TWU L556	Gilliam, Matt B	4.30	\$1,505.00
02/14/2022	Communications with SWA counsel re SWA motion to extend trial date; redacting exhibits for MSJ materials; preparing notice of compliance for filing with court	Gilliam, Matt B	1.30	\$455.00
02/15/2022	Redacting exhibits for MSJ materials and preparing and organizing all MSJ materials for filing	Gilliam, Matt B	7.10	\$2,485.00
02/16/2022	Redacting exhibits for MSJ materials and preparing and organizing all MSJ materials for filing; revising notice of compliance	Gilliam, Matt B	5.40	\$1,890.00
02/17/2022	Filing MSJ briefs and redacted exhibits and filing notice of compliance; communications with client re case status	Gilliam, Matt B	2.20	\$770.00
				\$258,790.00

Date	Narrative	Attorney	Hours	Amount
8/27/2021	Review local rules and court order regarding summary judgment motions; email with Matt Gilliam regarding summary judgment motion procedures.	JW	0.10	\$37.50
8/31/2021	Telephone call with Matt Gilliam regarding summary judgment motion filing procedures and logistics.	JW	0.40	\$150.00
8/31/2021	Review applicable rules and procedures for filing nondocumentary materials in support of summary judgment motion; prepare filing materials and transmittal correspondence to clerk.	JW	0.90	\$337.50

9/1/2021	Telephone call with Matt Gilliam regarding motion for summary judgment filing rules and procedures (.5); review draft of brief in support of motion for summary judgment (.8); work on submission of video files(. 1); email correspondence with Matt Gilliam regarding TWU request for motion to extend (.2).	JW	1.60	\$600.00
9/2/2021	Receive and review TWU's motion to extend MSJ deadline (.2); emails with Matt Gilliam regarding MSJ filings (.2); work on preparing submission of video in separate filing (.8); receive and review Southwest's motion for summary judgment, brief, and appendix in support (.8).	JW	2.00	\$0.00
9/3/2021	Attention to submission of video files for filing in connection with Motion for Summary Judgment; receive and review court order granting MSJ extension.	JW	0.60	\$225.00
9/7/2021	Receive and review Plaintiffs filed MSJ and supporting documents, and docket MSJ response dates.	JW	0.40	\$150.00
9/9/2021	Receive and review filing confirmation of manually filed portion of MSJ Appendix.	JW	0.10	\$37.50
10/5/2021	Receive and review Southwest's and TWU's responses and briefs to Carter's motion for summary judgment; docket reply due date.	JW	0.60	\$225.00
10/18/2021	Review drafts of reply briefs in support of motion for summary judgment.	JW	0.80	\$300.00
2/9/2022	Telephone call with Matt Gilliam and review email correspondence between counsel regarding compliance with court order regarding motion to seal; receive and review court email with instructions summary judgment motion.	JW	0.60	\$225.00
2/17/2022	Receive and review re-filed motion for summary judgment briefs and appendices per court order, and notice to court regarding compliance with order.	JW	0.30	\$112.50
3/1/2022	Review court order regarding Southwest's summary judgment motion.	JW	0.10	\$37.50
				\$2,437.50

Total Fees For Plaintiff's MSJ	\$266,227.50
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